

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:)	
)	
THE FINANCIAL OVERSIGHT AND)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO)	Title III
)	
as representative of)	Case No. 17-BK-03283 (LTS)
)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,)	
)	
Debtors. ¹)	
In re:)	
)	PROMESA
THE FINANCIAL OVERSIGHT AND)	Title III
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	Case No. 17-BK-03566 (LTS)
as representative of)	
)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE)	
GOVERNMENT OF THE COMMONWEALTH OF)	
PUERTO RICO,)	
)	
Debtor.)	
THE SPECIAL CLAIMS COMMITTEE OF THE)	
FINANCIAL OVERSIGHT AND MANAGEMENT)	Adv. Proc. No. 19-00356 (LTS)
)	

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK- 3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK- 4780) (Last Four Digits of Federal Tax ID: 3747).

BOARD FOR PUERTO RICO, ACTING BY AND)
THROUGH ITS MEMBERS,)

and)

THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS)
(OTHER THAN COFINA),)

as co-trustees of)

THE EMPLOYEES RETIREMENT SYSTEM OF THE)
GOVERNMENT OF PUERTO RICO,)

Plaintiff,)

v.)

DEFENDANT 1M, *et al.*,)

Defendants.)

THE SPECIAL CLAIMS COMMITTEE OF THE)
FINANCIAL OVERSIGHT AND MANAGEMENT)
BOARD FOR PUERTO RICO, ACTING BY AND)
THROUGH ITS MEMBERS,)

and)

THE OFFICIAL COMMITTEE OF UNSECURED)
CREDITORS OF ALL TITLE III DEBTORS)
(OTHER THAN COFINA),)

as co-trustees of)

THE EMPLOYEES RETIREMENT SYSTEM OF THE)
GOVERNMENT OF PUERTO RICO,)

Plaintiff,)

v.)

STOEVEER GLASS & CO., *et al.*,)

Adv. Proc. No. 19-00357 (LTS)

Defendant.

THE SPECIAL CLAIMS COMMITTEE OF THE
FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, ACTING BY AND
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF ALL TITLE III DEBTORS
(OTHER THAN COFINA),

as co-trustees of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,

Plaintiff,

v.

DEFENDANT 1H-78H,

Defendants.

THE SPECIAL CLAIMS COMMITTEE OF THE
FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, ACTING BY AND
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF ALL TITLE III DEBTORS
(OTHER THAN COFINA),

as co-trustees of

Adv. Proc. No. 19-00359 (LTS)

Adv. Proc. No. 19-00361 (LTS)

THE EMPLOYEES RETIREMENT SYSTEM OF THE)
GOVERNMENT OF PUERTO RICO,)
)
Plaintiff,)
)
v.)
)
DEFENDANT 1G-50G, *et al.*,)
)
Defendants.)
)
----- X

**NOTICE OF RULE 30(b)(6) DEPOSITION
OF THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 30(b)(6), made applicable to this proceeding by 48 U.S.C. § 2170 and Federal Rules of Bankruptcy Procedure 7026 and 7030(b)(6), the defendants, by and through their counsel, will take the deposition upon oral examination of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (the “ERS”).

PLEASE TAKE FURTHER NOTICE THAT the deposition will take place on January 13, 2020, at 9:30 a.m. at the offices of Delgado & Fernández, LLC , or at such other date, time, or location as the parties may agree or as may be ordered by the Court. Testimony will be recorded by video tape and stenographer before an officer duly authorized by law to take testimony and administer oaths and will continue from day to day until completed.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Fed. R. Civ. P. 30(b)(6) and Fed. R. Bankr. P. 7030(b)(6), the ERS is required to designate and produce one or more officers, directors, managing agents, or other persons who consent to testify on its behalf with respect to the matters set forth in Schedule A. The person(s) so designated shall be required to testify as to each of those matters known or reasonably available to the ERS.

In San Juan, Puerto Rico, today December 18, 2019

/s/ Alfredo Fernández-Martínez _____

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² Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel), L.P., and Oaktree Opportunities Fund IX (Parallel 2), L.P. hold through Opps Culebra Holdings, L.P. Oaktree Huntington Investment Fund II, L.P. holds through Oaktree Opportunities Fund X Holdings (Delaware), L.P. Oaktree Opportunities Fund X, L.P., Oaktree Opportunities Fund X (Parallel), L.P., and Oaktree Opportunities Fund X (Parallel 2), L.P. hold through Oaktree Opps X Holdco Ltd.

SCHEDULE A

DEPOSITION TOPICS

1. ERS's Borrowing authority under the ERS Enabling Act as it existed in 2008.
2. All actions, inquiries, and investigations undertaken by ERS to determine the validity and legality of the ERS Bond Issuance, and the existence of any defect in the ERS Bond Issuance, at any time, including but not limited to: (a) the subject of the action, inquiry, or investigation; (b) all Individuals involved in the action, inquiry, or investigation; (c) the reasons for the action, inquiry, or investigation; and (d) the findings and results of the action, inquiry, or investigation.
3. All actions, inquiries, and investigations undertaken by ERS to determine the accuracy of assertions in the ERS Bond Resolution, the Official Statements, all attachments to the Official Statements, and all opinions of counsel offered in connection with the ERS Bond issuance, at any time, including but not limited to: (a) the subject of the action, inquiry, or investigation; (b) all Individuals involved in the action, inquiry, or investigation; (c) the reasons for the action, inquiry, or investigation; and (d) the findings and results of the action, inquiry, or investigation.
4. Statements by anyone made on or before August 1, 2008 questioning ERS's authority to undertake the ERS Bond Issuance.
5. Any and all alternative financing structures that ERS considered in connection with the ERS Bond Issuance.
6. The role of the Underwriters in the ERS Bond Issuance.
7. ERS's determination that the ERS Bond Issuance was *ultra vires*, including but not limited to: (a) the Individuals who contributed to that determination, (b) when that

determination was made, (c) the factual evidence and legal reasoning behind that determination, (d) materials relied upon in making that determination, and (e) any materials generated in connection with the making of that determination.

DEFINITIONS

As used herein, the following terms shall have the stated meanings:

1. “Borrowing” means any structure by which a borrower receives funds in exchange for a promise to repay them, including but not limited to obtaining a loan and selling bonds or other debt securities.
2. “ERS” means the Employees Retirement System of the Government of the Commonwealth of Puerto Rico and any person advising, representing, or acting for or on behalf of ERS.
3. “ERS Bond Resolution” means the Pension Funding Bond Resolution adopted by the ERS on or about January 24, 2008, as amended or supplemented by Supplemental Resolutions.
4. “ERS Bonds” means the debt issued by the ERS in 2008 pursuant to the ERS Bond Resolution.
5. “ERS Bond Issuance” means the issuance of each series of ERS Bonds.
6. “ERS Enabling Act” means Act 446-1951, as amended.
7. “Individual” means as any natural person.
8. “Official Statements” refers to the official statements issued in connection with each series of ERS Bonds.
9. “Underwriters” means the underwriters for the ERS Bond Issuance.